

# Sage Legal LLC

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July 22, 2024

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Vera M. Scanlon, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13A South  
Brooklyn, NY 11201-1804

**Re: Sanchez v. EZ Parking Corp., et al.**  
**Case No.: 1:23-cv-4052 (AMD) (VMS)**

Dear Judge Scanlon:

This firm represents Defendant EK Premier Services LLC (“EK Premier”) in the above-referenced case. EK Premier respectfully submits this letter motion for an adjournment of the telephonic status conference currently scheduled for July 23, 2024 at 10:30 AM.

Consistent with ¶ II(b) of this Court’s Individual Practice Rules, EK Premier submits:

- (i) the original date of the conference is set forth above;
- (ii) there have been no previous requests for an adjournment of this conference;
- (iii) all counsel of record consent to an adjournment of the status conference;
- (iv) the reason for the adjournment request is because your undersigned will be conducting an all-day mediation in the matter of Shkolir, et al. v. Rx2Go, Inc., et al., Case No.: 1:23-cv-7256 (OEM) (PK) and will thus be unavailable to appear for the conference;
- (v) three suggested adjournment dates that suit all parties are (a) Friday, July 26, 2024; (b) Thursday, August 1, 2024, but only after 3:00 PM; and (c) Friday, August 2, 2024; and
- (vi) EK Premier does not believe that the requested adjournment will affect any other scheduled dates such that a proposed revised scheduling order must be attached; indeed, EK Premier respectfully submits that a pre-motion conference before the Hon. Ann M. Donnelly, U.S.D.J. should proceed such that EK Premier may seek judgment on the pleadings due to the lack of enterprise and/or individual coverage under the Fair Labor Standards Act.

Based on the foregoing, EK Premier’s consent letter motion for an adjournment of the telephonic status conference should be granted. See Fed. R. Civ. P. 6(b)(1)(A).

EK Premier thanks this Court for its time and attention to this case.

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Dated: Lake Success, New York  
July 22, 2024

Respectfully submitted,

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

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